

**UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA**

In re: Bair Hugger Forced Air Warming
Products Liability Litigation

MDL No. 15-2666 (JNE/FLN)

This Document Relates To:
All Actions

**STATEMENT INSTEAD OF
REDACTED DOCUMENTS**

I certify that Defendants have filed a Memorandum in Opposition to Plaintiffs' Motion for Leave to Amend Master Long Form and Short Form Complaints to Add Claim for Punitive Damages, and a supporting Declaration of Benjamin W. Hulse with Exhibits 1–30.

The following Declaration Exhibits (Nos. 16, 17, 20, 24) have been marked “Confidential” under the Protective Order, and redaction is impracticable:

1. Exhibit 16, which is a test report prepared by BIOTEST Laboratories. The document was designated as “Confidential” by Defendants pursuant to the Protective Order.

2. Exhibit 17, which is a test report prepared by BIOTEST Laboratories. The document was designated as “Confidential” by Defendants pursuant to the Protective Order.

3. Exhibit 20, which is a Patient Warming Formal Test Report dated August 25, 2016. The document was designated as “Confidential” by Defendants pursuant to the Protective Order.

4. Exhibit 24, which is a copy of a document entitled “Ion Armour Thoughts.”
The document was designated as “Confidential” by Defendants pursuant to the Protective Order.

Dated: May 11, 2017

Respectfully submitted,

/s/ Benjamin W. Hulse
Benjamin W. Hulse (MN #0390952)
BLACKWELL BURKE P.A.
431 South Seventh Street
Suite 2500
Minneapolis, MN 55415
Phone: (612) 343-3256
Fax: (612) 343-3205
Email: bhulse@blackwellburke.com

**Co-counsel for Defendants
3M Company and
Arizant Healthcare, Inc.**